

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

-----X		
NINOUSKA GOMEZ	:	CIVIL ACTION
420 Smith Street	:	
Dunmore, PA 18512	:	
	:	
Plaintiff	:	CASE NO.
vs.	:	
	:	
OXFORD LAW, LLC	:	
311 Veterans Highway, Suite 100A	:	
Levittown, PA 19056	:	
	:	
Defendant	:	
-----X		

NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. §1441

Defendant, Oxford Law, LLC ("Defendant") hereby removes to this Court the state court action described below.

1. On or about January 23, 2014, Plaintiff, Ninouska Gomez filed a civil action complaint in the Court of Common Pleas of Lackawanna county, Pennsylvania, captioned Ninouska Gomez v. Oxford Law, LLC, at Case No. 14-CV-438.
2. Defendant was served with the summons and complaint on or about February 11, 2014. Pursuant to 28 U.S.C. §1446(b) this notice is being timely filed. A copy of the summons and complaint are attached hereto as Exhibit "A".
3. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1331, and is one which may be removed to this court by Defendant pursuant to the provisions of 28 U.S.C. §1441(b) in that it arises under the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq.

WHEREFORE, Defendant Oxford Law, LLC respectfully requests that this action be removed to the United States District Court for the Middle District of Pennsylvania.

/s/ Michael Ratchford

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Michael Ratchford, Esquire  
120 N. Keyser Avenue  
Scranton, PA 18504  
Tel. 570-558-5510  
Attorney for Defendant  
Oxford Law, LLC

Dated: March 13, 2014

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CERTIFICATION OF SERVICE

The undersigned counsel for Defendant Oxford Law, LLC hereby certifies that on this date he served a copy of Defendant's Notice of Removal, by regular first class mail, postage prepaid, upon:

Carlo Sabatini, Esquire  
Sabatini Law Firm, LLC  
216 N. Blakely Street  
Dunmore, PA 18512

Clerk of Judicial Records  
Brooks Building  
436 Spruce Street  
Scranton, PA 18503

/s/ Michael Ratchford

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Michael Ratchford, Esquire  
120 N. Keyser Avenue  
Scranton, PA 18504  
Tel. 570-558-5510  
Attorney for Defendant  
Oxford Law, LLC

Dated: March 13, 2014